Case 1:25-cv-03797-ELR

Document 12

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4. [Proposed] Order Granting Motion to Stay Proceedings.

These documents are submitted pursuant to Federal Rule of Civil

Procedure 55(c) and in support of Defendant's Motion to Stay (Dkt.8) and

Motion to Set Aside Clerk's Entry of Default, in accordance with the Local

Rules of the United States District Court for the Northern District of Georgia.

Respectfully submitted this 6th day of October, 2025.

Yan Goldshteyn Principal Attorney

Spartan Law Corporation 427 N Canon Dr. Suite 212

Beverly Hills, CA. 90210 Telephone: 323-450-7000

yan@spartanlawcorp.com

Defendant

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Certificate of Compliance

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as required by the Court in Local Rule 5.1(B).

Respectfully submitted on October 6, 2025.

Yan Goldshteyn Principal Attorney Spartan Law Corporation 427 N Canon Dr. Suite 212 Beverly Hills, CA. 90210 Telephone: 323-450-7000 yan@spartanlawcorp.com Defendant

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Case 1:25-cv-03797-ELR Document 12 Filed 10/09/25 Page 3 of 3 Page 4 of 4 Filed 10/06/25 Case 1:25-cv-03797-ELR Document 12 2 CERTIFICATE OF SERVICE 3 4 I HEREBY CERTIFY that on this day of October 2025, a copy of 5 6 the foregoing Notice of Filing was filed via mail and served via first class mail to: 7 BEKIARES ELIEZER, LLP 8 Attention: Kennington R. Groff 9 Melanie K. Lane Zachary C. Eyster 10 2870 Peachtree Rd. #512 11 Atlanta GA 30305 12 13 Respectfully Submitted, 14 15 16 Yan Goldshteyn 17 Principal Attorney 18 Spartan Law Corporation 427 N Canon Dr. Suite 212 19 Beverly Hills, CA. 90210 20 Telephone: 323-450-7000 yan@spartanlawcorp.com 21 Defendant 22 23 24 25 26 27 28

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